

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

MOSAID TECHNOLOGIES INC.,

Plaintiff,

v.

INFINEON TECHNOLOGIES AG and
INFINEON TECHNOLOGIES AMERICAS
CORP.,

Defendants.

Civil No. 1:25-cv-358-ADA

JURY TRIAL DEMANDED

**DEFENDANTS' ELECTION OF ASSERTED
PRIOR ART GROUNDS**

Pursuant to the First Amended Scheduling Order (D.I. 43), Defendants Infineon Technologies AG and Infineon Technologies Americas Corp. (collectively, "Infineon") elect the following prior art invalidity grounds:

U.S. Patent No. 7,051,306

Claim Number	Listing of Grounds
16	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
18	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
19	1. PSOC 1

	2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
20	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
22	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
23	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
26	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
27	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
28	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec.

	4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin, and Borkar
30	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
33	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
36	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar
37	1. PSOC 1 2. Intel Pentium processors in view of Semeraro 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Nicol in view of Nowka and Borkar 5. Nowka in view of Bertin and Borkar

U.S. Patent No. 7,111,179

Claim Number	Listing of Grounds
1	1. PSOC 1 2. Intel Pentium processors 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Walsh in view of Hetzler, Milligan, and Furuichi 5. Kannan in view of Altmejd, Vardi, and Nakamura
2	1. PSOC 1 2. Intel Pentium processors

	3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Walsh in view of Hetzler, Milligan, and Furuichi 5. Kannan in view of Altmejd, Vardi, and Nakamura
3	1. PSOC 1 2. Intel Pentium processors 3. Transmeta Crusoe processor in view of the ACPI Spec. 4. Walsh in view of Hetzler, Milligan, Tung, and Furuichi 5. Kannan in view of Altmejd, Vardi, and Nakamura
5	1. PSOC 1 2. Intel Pentium processors 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Walsh in view of Hetzler, Milligan, and Furuichi 5. Kannan in view of Altmejd, Vardi, and Nakamura
6	1. PSOC 1 2. Intel Pentium processors 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Walsh in view of Hetzler, Milligan, and Furuichi 5. Kannan in view of Altmejd, Vardi, and Nakamura
13	1. PSOC 1 2. Intel Pentium processors 3. Transmeta Crusoe processors in view of the ACPI Spec. 4. Walsh in view of Hetzler, Milligan, and Furuichi 5. Kannan in view of Altmejd, Vardi, and Nakamura

U.S. Patent No. 7,349,448

Claim Number	Listing of Grounds
4	1. Pixley in view of Watanabe, 2. PSOC 1 in view of Watanabe, Vitanen

	3. AMBA in view of Pixley, Vitanen 4. Atmel in view of Pixley, Vitanen 5. Kostarnov in view of Pixley, Watanabe
8	1. Pixley in view of Watanabe, 2. PSOC 1 in view of Watanabe, Vitanen 3. AMBA in view of Pixley, Vitanen 4. Atmel in view of Pixley, Vitanen 5. Kostarnov in view of Pixley, Watanabe

Infineon's election of prior art invalidity grounds is without prejudice. For example, this election has been made without the benefit of claim construction, fact discovery, final articulation of MOSAID's infringement theories, and prior to any decisions by the Patent Trial and Appeal Board regarding institution of an *inter partes* review proceedings. In accordance with the procedures set forth in the Scheduling Order (D.I. 43), Infineon reserves the right to substitute grounds should it have good cause to do so. Also in accordance with the Scheduling Order, this election is made without prejudice to any non-prior art grounds of invalidity (such invalidity grounds brought pursuant to 35 U.S.C. §§ 101, 112) that Infineon has disclosed and will pursue in this case. Further, notwithstanding Infineon's election of prior art grounds, Infineon reserves the right to rely on any previously-disclosed reference to illustrate the state of the art at the time of the alleged invention claimed by each of MOSAID's asserted patent, to demonstrate how a skilled artisan would understand the teachings of references included in Infineon's elected prior art grounds, and/or to demonstrate the knowledge or motivations of a skilled artisan.